



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

4WD-SSMB

MEMORANDUM

SUBJECT: Beulah Landfill Superfund Site
Five-Year Review

FROM: Randa Chichakli, RPM
South Site Management Branch

THRU: Curt Fehn, Chief
South Site Management Branch

TO: Richard D. Green, Director
Waste Management Division

Attached please find the Five-Year review Report for the Beulah Landfill Superfund Site in Pensacola, Escambia County, Florida. Section 121(C) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, requires that if a remedial action is taken that results in any hazardous substances, pollutants, or contaminants remaining at the site, the Environmental Protection Agency (EPA) shall review the remedial action no less often than each five years after initiation of the remedial action to assure that human health and the environment are being protected by the remedial action being implemented.

In September 1993 the Record of Decision was signed. No action was found necessary to ensure the protection of human health or the environment. The ROD also specified that groundwater monitoring would continue to ensure that this "no action" remains protective. Since the ROD execution, institutional controls have been imposed at the Site to prohibit future occupancy of the Site, Site access controls have been put in place, an FDEP Closure Permit has been secured for the Site, and a groundwater monitoring program under the Closure Permit has been underway for over four years at the Site. Under the FDEP Closure Permit, all applicable or relevant and appropriate requirements (ARARs) are applied, the construction of a "Subtitle D" landfill cap will be completed at the Site, and the groundwater monitoring shall continue for a minimum of 30 years after the completion of the Site closure construction tasks. The Beulah Landfill Superfund Site was deleted from the National Priorities List June 22, 1998.

The attached Five-Year Review, prepared by Escambia County (Potentially Responsible Party), documents the current conditions at the site and states the ROD has been implemented and remains protective and poses no unacceptable risk to human health and the environment. EPA concurs with this report and its conclusions.

Attachment

Approved by:

Richard D. Green, Director
Waste Management Division
US EPA Region 4

Date:

9/24/98

**FIVE-YEAR REVIEW REPORT
BEULAH LANDFILL SITE
ESCAMBIA COUNTY, FLORIDA**

- prepared by -

Escambia County Department of Public Works
Solid Waste Division
Pensacola, Florida

September 16, 1998

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- Attachment 2 - Closure Permit, Beulah Landfill Site; Florida Department of Environmental Protection
- Attachment 3 - Interview Questionnaires, Beulah Landfill Site Five Year Report
- Attachment 4 - Inspection Report, Beulah Landfill, Florida Department of Environmental Protection; Spring, 1998

1.0 INTRODUCTION

This is the five-year review report for the Beulah Landfill Site, Escambia County, Florida. The Beulah Landfill Site, formerly a Superfund site, was removed from the National Priority List (NPL) on June 22, 1998. This report has been prepared by the Escambia County Public Works Department at the request of Region IV, United States EPA, Atlanta, Georgia.

1.1 Site Name & Location

The Beulah Landfill Site is about 10 miles northwest of Pensacola (Figure 1). Additional information related to the site location may be reviewed in the Record of Decision (ROD) for the Beulah Landfill Site.

1.2 Physical Description

Topographically, the Site is located in the W½NW¼ and a portion of the E½ NW¼, Section 15, T.1 S., R.31 W. in southwestern Escambia County, Florida. Additional information related to the physical description may be reviewed in the ROD for the Beulah Landfill Site.

1.3 Site History

The Site was operated as a municipal landfill between the years of 1966 and 1984. The Site consists of two sections (northern-half and southern-half).

1.3.1 Northern Half History

The northern half of the site is a former municipal solid waste landfill which only received solid wastes. Waste depths ranged from 4 to 10 feet in the northwest section, increasing to about 25 feet in the northeast section. At the time of the Remedial Investigation (see Section 1.3.2 below), the wastes were covered with native soil, then planted in pine trees (note that the Northern Half was not included in the Remedial Investigation). Since that time, the soil and trees have been removed and closure to current Florida Department of Environmental Protection (FDEP) standards is underway.

1.3.2 Southern Half History

The Southern half of the site was a sand borrow pit prior to 1965. Solid wastes were initially deposited in the southwest corner of the borrow pit to depths of 15 to 20 feet. The disposal cells moved to the east as the landfill matured, and increased in depth to about 35 feet. In 1968, the first domestic septage and wastewater treatment sludges were deposited in a 10-acre excavated and bermed area at the southwest corner of the Site. Sludge deposition continued in the Southern half, ceasing in June 1984; sludge disposal was at rates of up to 20,000 gallons per day. No soil cover was placed on the sludge ponds after deposition ceased.

History of the Southern half pertaining to EPA's Preliminary Assessment of the Site, the listing on the National Priorities List (NPL), the negotiations with Potentially Responsible Parties (PRPs), and the execution of an Administrative Order on Consent (AOC) for an RI/FS may be

reviewed in the ROD for the Beulah Landfill Site. The history of the PRP-led Remedial Investigation (RI) may be reviewed in the ROD for the Beulah Landfill Site. After the draft ROD was published and a public comment period held, the Record of Decision was signed on September 16, 1993. The site was de-listed from the NPL on June 22, 1998.

The remedy selected in the ROD included imposing institutional controls to limit future development at the site, taking steps to prevent site access by trespassers, completing landfill closure to FDEP standards, and continuing ground water monitoring to ensure that this remedy remained protective of human health and the environment.

At the present time, the final closure of the Southern Half is underway.

1.3.3 Recent History

In the five years since execution of the ROD, Escambia County has assumed responsibility for day-to-day activities at the Site. During this period, the following milestones have been achieved in meeting the specifications of the EPA's remedy.

1. Institutional controls, in the form of a Comprehensive Land Use Plan designation of "Conservation," were imposed on the site in 1993 (see Attachment 1). Since the date of the designation of the property as "Conservation," there has been no encroachment of residential land use at or near the Site.
2. An FDEP Permit for Closure of Beulah Landfill was issued on July 8, 1994 and modified July 10, 1995 (Attachment 2). The provisions of that permit and underlying Florida regulations ensure that post-closure care and ground water monitoring will continue for a minimum of 30 years after closure is completed.
3. Escambia County has maintained boundary fences and gates in good repair since ROD execution. Note that there are significant natural barriers along the north, west, east and southeast boundaries of the Site.
4. Escambia County attempted Site closure using its own personnel and equipment in the period 1994 to 1996, when it was realized that County resources were insufficient to the task. The Site closure plan was revised, then re-approved by FDEP in 1997 and the County's contractor is currently completing the revised final closure. As of the date of this Five-Year Report, the contractor estimates that closure of the Northern-Half is 26% complete and closure of the Southern-Half is 28% complete (September 9, 1998 estimates by SCS Engineers).

1.4 Summary of Record of Decision

The Baseline Risk Assessment and the comparison of exposure concentrations to chemical-specific standards indicated that there is no unacceptable risk to human health or the environment at the Site. Therefore, no action was found necessary to ensure the protection of human health or the environment. However, the ROD specified that ground water monitoring would continue to ensure that this "no action" remains protective of human health or the environment.

1.5 Statement of Purpose (Five-Year Review)

The purpose of this Five-Year Review is to:

1. Confirm that the remedy remains effective in protecting human health and the environment, and,
2. Evaluate whether original cleanup levels remain protective of human health and the environment.

2.0 REMEDIAL OBJECTIVES

This section recapitulates the process through which the remedy was selected by EPA. The purpose of this recapitulation is to help determine if the selected remedy is still appropriate for the Site, and that its effectiveness has not been compromised by events since the ROD was executed.

2.1 Site Characterization Summary, Contaminants of Concern

Site characterization took place in 1992 in accordance with the Work Plan; two sampling rounds took place. In the first sampling round, the following media were sampled:

1. Surface soil/sludge (dried) from the southern-half of the Site; samples SB-1 through SB-28.
2. Sediment from Coffee Creek and Elevenmile Creek; samples SD-1 through SD-8.
3. Surface water from Coffee Creek and Elevenmile Creek; samples SW-1 through SW-8.
4. Ground water from on-site perimeter monitor wells (BMW-1 through BMW-7, and MW-2 through MW-6).
5. Air from temporary locations south (Stations 1 and 2 [QA/QC]) and north (Stations 3 through 5) of the Site.

All media sampled were analyzed for Target Compound List / Target Analyte List (TCL/TAL) including pesticides and polychlorinated byphenyls (PCBs).

In the second sampling round, "re-sampling" was completed for six (6) surface soil/sludge locations, five (5) stream sediment locations, five (5) surface water stations, and nine (9) ground water monitor wells. The principal purpose of this re-sampling was to test for pesticides and PCBs, since the first samples were not analyzed by the lab within holding times; sediment and surface water were also re-sampled for cyanide. In addition, new temporary wells (TW-1 through TW-3) were installed and sampled south of MW-6 to determine if contaminants found in MW-6 were migrating off site. The temporary wells were sampled for pesticides, PCBs and the TCL. Also, well MW-6 was re-sampled for pesticides, PCBs and the TCL; surface soil/sludge station SB-27 was re-sampled for the full TCL/TAL analytes as well as polychlorinated dibenzofurans and dibenzodioxins (PCDF/PCDD), calculated in Total Equivalency Quotient (TEQ) values.

A list of all contaminants of concern for all media was provided in the ROD (Appendix C: Table 1 therein). The contaminants localized to the respective environmental media were somewhat

inconsistent from media to media. Few contaminants were found to be related to all media of concern.

2.2 Human Health Risk Evaluation

The evaluation of the risk to human health was completed by the EPA's contractor during the completion of the Baseline Risk Assessment (BRA), using the information obtained in the RI. The risk to human health was determined through the development of exposure and toxicity assessments and the characterization of risk. Though it was determined that there were no known complete exposure pathways, a "trespasser scenario" was developed to be protective. The resulting scenario's carcinogenic risk equalled 4.5×10^{-6} while the total non-carcinogenic HI equalled 0.36. The EPA concluded the actual or threatened releases of hazardous substances from this Site do not present an imminent and substantial endangerment to public health or welfare.

2.3 Environmental Exposure (Ecological) Evaluation

The evaluation of the risk to the environment was also completed by the EPA's contractor as part of the BRA. Both receptor-specific quantitative risk estimates, and aquatic and benthic community quantitative risk estimates were prepared for the Site. As noted in the ROD, actual or threatened releases of hazardous substances from this Site do not present an imminent and substantial endangerment to the environment.

2.4 Community Participation (during RI and recent)

Community participation during the RI was summarized in the ROD; it included development of the EPA's community relations plan, an RI-kickoff meeting, published notifications, availability of RI and Risk Assessment documents at public repositories, a Plan Public Meeting, a public comment period, and EPA responses to comments received from the public.

In the five years since ROD execution, the County has continued to publicize its activities at the Site in the local news media. All activities at the site have been preceded with action by the Escambia County Board of County Commissioners; these meetings are in open sessions where community comment is encouraged. In addition, both the County and the Florida Department of Environmental Protection have responded to a variety of oral and written inquiries regarding site conditions, closure progress, and miscellaneous topics. Finally, the Notice of the proposed EPA action to remove the Site from the NPL was published in the local newspaper, together with an article explaining the EPA's decision to effect the de-listing. No additional responses were received by the County due to this publication.

2.5 Selected Remedy

The selected remedy was specified in the ROD as "no action," together with monitoring of ground water quality to ensure that the "no action" remains protective of human health or the environment, plus landfill closure in accordance with Chapter 62-701, Florida Administrative Code (FAC).

3.0 ARARs REVIEW

3.1 FDEP Site Closure Requirements

Florida requirements for closure and post-closure care of inactive solid waste landfills are contained in Rule 62-701.600 - 620, FAC. In accordance with these requirements, post-closure long-term care is to continue for a minimum of 30 years after the date closure is completed, and may be extended by FDEP for good cause. This ARAR is essentially unchanged since the date of execution of the ROD.

3.2 State ARARs Promulgated or Modified Since ROD Signature

Since the Florida Department of Environmental Protection has applied any applicable, or appropriate and relevant, policies and regulations in their Site closure permit and oversight, it is clear that any new ARARs are being applied.

4.0 SUMMARY OF SITE INSPECTION

This section discusses current conditions at the Site. It begins with an overview of site improvements that have either been completed since the execution of the ROD, or that are in progress. Separate discussions are then provided on interviews completed during this assessment, the site inspection by the "authorized official," and any areas of non-compliance that have been identified.

4.1 Site Improvements Since ROD Execution

The following improvements, specified as components of the remedy in the ROD, have been completed since the ROD was executed:

1. Institutional controls have been imposed on the Site; they will prohibit future occupancy of the Site.
2. Site access controls have been put in place.
3. A Florida Department of Environmental Protection Closure Permit has been secured for the site.
4. A ground water monitoring program has been underway, under the provisions of the Closure Permit, for over four years at the Site.

The following additional improvements, specified as components of the remedy in the ROD, are currently in progress:

5. Closure to Florida Department of Environmental Protection specifications is 26% complete for the northern-half and 28% complete for the southern-half of the Site. The objectives of the closure are as follows:

- a. Cap the waste with a "Subtitle D" cover. This will ensure that the waste is isolated and stabilized. Trespassers will not be able to come into contact with the waste, animal receptors will not come into contact with the waste, airborne emissions from the waste will cease, and rainfall will not come into contact with the waste. Rainfall percolation through the waste to ground water will cease or be substantially attenuated. Rainfall will be routed off the cap to a stormwater treatment system in a fashion that prevents erosion.
- b. Expand the ground water monitoring network. FDEP requested that three new monitor wells be installed along the perimeter of the waste at the Site. In addition, the County has decided that one existing well (BMW-3) is no longer providing representative samples of ground water and is planning to replace that well with a new well.

4.2 Interviews

Interviews were conducted with the following individuals:

1. Ms. Cindy Anderson, P.E., Escambia County Engineer; Ms. Anderson was Escambia County's project manager during the RI. Ms. Anderson was interviewed as a representative of Previous Staff/Management.
2. Mr. John Kusnerek, Escambia County Solid Waste Division; Mr. Kusnerek is the County's current compliance project manager for the Site. Mr. Kusnerek was interviewed as a representative of the PRPs and as a Local Government Contact.
3. Mr. Peter Dohms, P.G.; Condor Earth Technologies, Inc.; Mr. Dohms provided consulting services to the County during the RI, and has provided review and oversight of water quality monitoring at the Site since the Closure Permit was issued. Mr. Dohms was interviewed as a representative O&M contractor.
4. Mr. Brad Hartshorn, Project Geologist, Ground Water Cleanup Section, Northwest District, Florida Department of Environmental Protection; Mr. Hartshorn is responsible for compliance reviews of the water quality monitoring submittals for the Site. Mr. Hartshorn was interviewed as a representative State contact.
5. Mr. Gary C. James, resident of 7526 Jamesville Road; Mr. James is a nearest neighbor of the Site.

Copies of interview questionnaires are provided in Attachment 3 of this report.

4.3 Site Inspection

The Site Inspection was conducted on June 11, 1998 by Mr. Jack McNulty, P.E., Solid Waste Section Chief, Northwest District, Florida Department of Environmental Protection. Mr. McNulty's report of inspection was submitted separately from this Report. A copy is included in Attachment 4.

4.4 Areas of Non-Compliance

As noted above, the County has completed those parts of the remedy that relate to institutional controls and the restriction of site access. Those parts of the remedy that relate to Site closure, and long-term care are partially completed and are continuing. The County asserts that the Site is in compliance with the provisions of the remedy, albeit not all tasks comprising the remedy are fully completed. The following discussion evaluates whether there is non-compliance with respect to Site ARARs.

Compliance of the Site with ARARs was evaluated on two levels. Those were, 1) compliance with Florida requirements for closure, and 2) compliance with Florida water quality standards (chemical-specific ARARs).

Florida's landfill closure requirements are imposed through a Closure Permit, which makes reference to applicable, or relevant and appropriate Florida laws and regulations. At the present time, the Site is undergoing final closure in conformance with the Closure Permit, Florida regulations, and Florida laws.

Routine semi-annual water quality monitoring has been underway on a regular schedule since the Closure Permit was finalized in 1994. The routine water quality parameters examine ground water and surface water, as defined in Florida regulations [Rule 62-701.510(8)(a) and (8)(b), FAC]. Evaluation of the water quality monitoring reports includes comparison of analytical concentrations with Florida enforceable standards [generally, Maximum Contaminant Levels (MCLs)].

Levels of the compound pentachlorophenol in monitor well MW-6 remain elevated above Florida MCLs, as determined in testing during the RI, and in routine ground water monitoring since the date of the ROD. The concentrations of pentachlorophenol reported during monitoring, however, are unchanged from those measured during the RI and evaluated during the BRA. The closure of the site with a synthetic liner will minimize the potential for rainfall percolation through the waste and ground water movement beneath the site, thus minimizing risk. The institutional controls at the Site will continue to ensure that no use is made of the site, so the remedy remains protective of human health and the environment.

5.0 RECOMMENDATIONS

Escambia County has been provided, and endorses the following recommendations:

1. Closure to FDEP specifications is to be completed at the earliest possible date by the County's contractor.
2. Thirty or more years of post-closure care and continued ground water monitoring will begin as of the date of closure completion.
3. Institutional controls and site access restrictions are to remain in force.

6.0 STATEMENT ON PROTECTIVENESS

Escambia County believes that the Site continues to pose no unacceptable risk to human health or the environment. Escambia County has implemented the remedy proposed in the ROD and believes that the selected remedy remains protective of human health and the environment.

7.0 NEXT REVIEW

The next Five-Year Review should be completed and submitted on or before September 16, 2003.

8.0 IMPLEMENTATION REQUIREMENTS

The County is required by the terms of the Closure Permit and FDEP's regulations on closure and post-closure care to conduct the following program:

- a. Complete construction of a "Subtitle D" landfill cap over the entire volume of waste at the Site.
- b. Supplement the existing water quality monitoring network with three new monitor wells and one replacement monitor well.
- c. Continue water quality monitoring and other post-closure care for a minimum of 30 years after the completion of the Site closure construction tasks.

These tasks will ensure that the Remedy remains protective of human health and the environment.

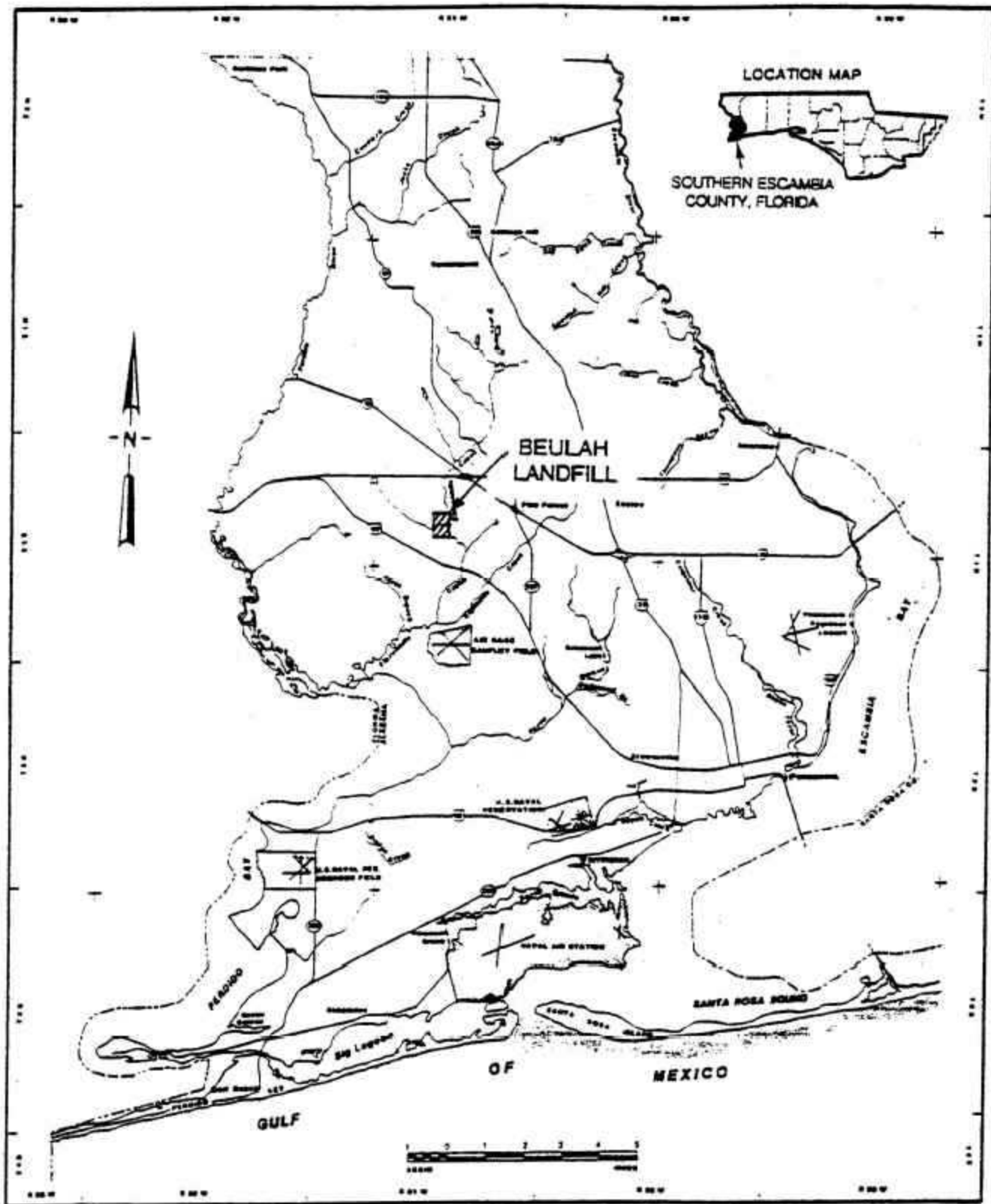
Respectfully Submitted,



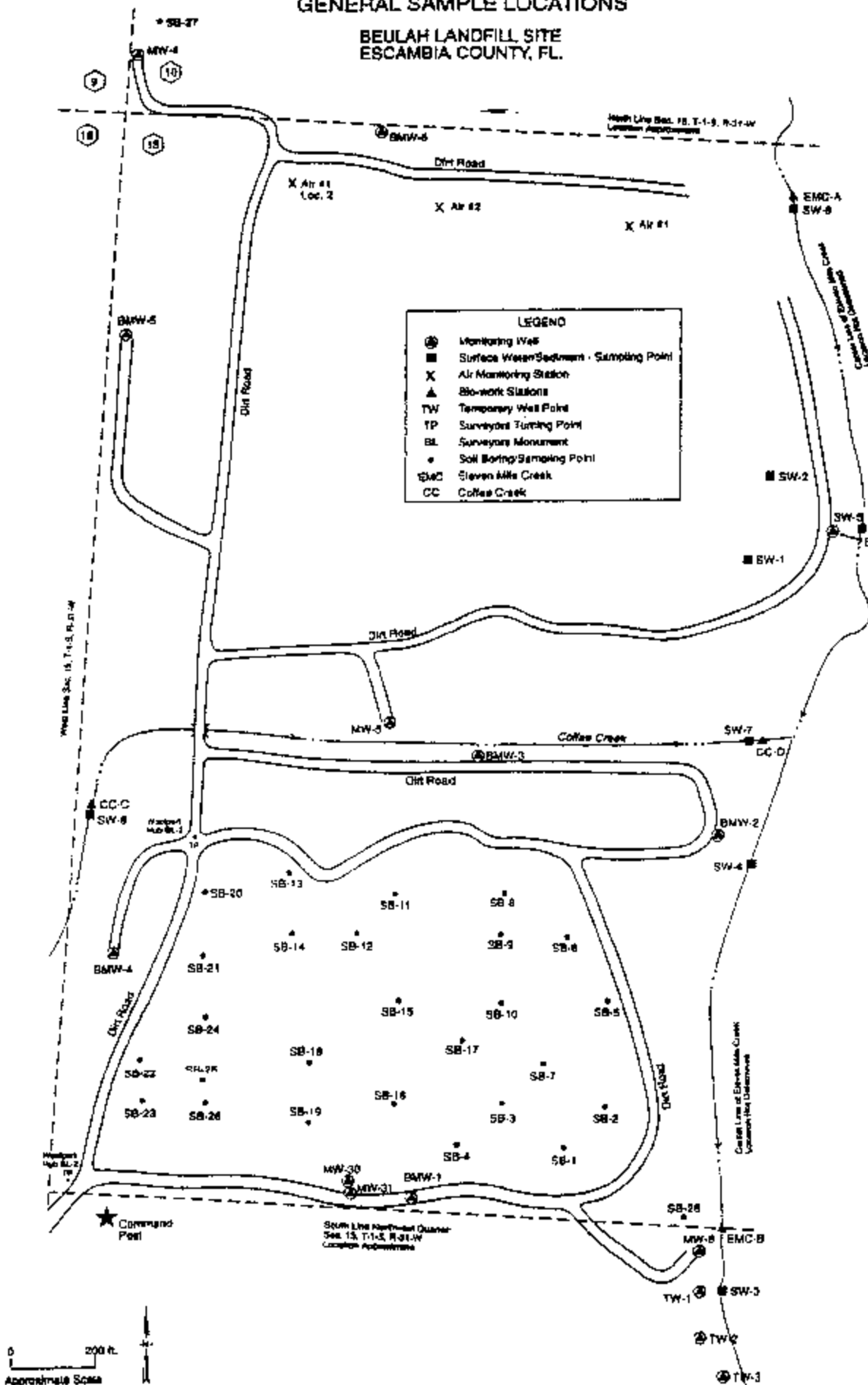
David Gregory
Director of Public Works

SITE LOCATION MAP

BEULAH LANDFILL SITE



GENERAL SAMPLE LOCATIONS

BEULAH LANDFILL SITE
ESCAMBIA COUNTY, FL.

ATTACHMENT 1

INSTITUTIONAL CONTROL, BEULAH LANDFILL SITE
ESCAMBIA COUNTY BOARD OF COUNTY COMMISSIONERS,
COMPREHENSIVE PLAN DESIGNATION AS "CONSERVATION"

BOARD OF COUNTY COMMISSIONERS

ESCAMBIA COUNTY, FLORIDA
SOLID WASTE MANAGEMENT
13009 BEULAH ROAD
CANTONMENT, FL 32533-8801

D.M. "MIKE" WHITEHEAD
District One
W.A. "BUCK" LEE
District Two
WILLIE J. JUNIOR
District Three
STEVE DEL GALLO
District Four
JOHNNY READING
District Five

TEL. (904) 968-6628
FAX (904) 968-0716



ROBERT W. KONCAR
COUNTY ADMINISTRATOR

March 24, 1993

Mr. Tony A. Best
Remedial Project Manager
South Superfund Branch
United States EPA, Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365:

Dear Mr. Best:

RE: Beulah Superfund Site

This letter is in response to what we believe is an error in the Roy F. Weston, Inc. March, 1993 Risk Assessment Technical Memorandum #1 and #3. The point in question concerns the potential for future exposure of hypothetical residential populations on the Beulah Landfill property. In the text of Technical Memorandum #1 and #3, Weston assumed that potentially exposed populations would include future residents of the site. This assumption is incorrect, as explained below.

Escambia County recently adopted its final State mandated Comprehensive Plan for the Beulah Landfill property. The Comprehensive Plan designation for Beulah Landfill is "Conservation". As such, Beulah Landfill may not, under any circumstances, be developed for residential use (See attached). A future change of this designation will require review and approval by the State of Florida, as well as advance notice of such a request to other interested parties, such as EPA and FDER.

It is our position that the "Conservation" designation, supported as it is by the authority of the State of Florida, is an ARAR for Beulah Landfill. As an ARAR, the prohibition against residential development should be considered during the risk assessment. Thus, it will be necessary for Weston to revise Technical Memorandum #1 and #3 to remove all exposure pathways that include residents on the site.

Furthermore, we draw your attention to the adjoining properties to the south, west, a north sides of Beulah Landfill, which belong

Mr. Tony Best
March 24, 1993

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to Champion International Paper Company. Those properties are designated "Industrial" in the Comprehensive Plan, a designation which also prohibits residential development on these adjoining properties.

Weston should also be notified that the entire area within a two-mile radius of Beulah Landfill is served with public water by the Escambia County Utilities Authority. The wells that supply the water to this area are located more than two miles from Beulah Landfill. When public water was brought to this area, the need for water from private domestic wells ceased.

If it becomes necessary to further reduce the risk of exposure, the Escambia County Health Department is prepared to take measures necessary, including identifying and ordering the permanent closure of existing domestic water wells in the area of concern.

If you have any questions or comments, feel free to call me at (904) 968-6628.

Sincerely yours,



Charles C. Miller
Director of Technical Services
Solid Waste Department

Attachment

c: Robert W. Koncar, County Administrator
Helen S. Chalk, Director of Public Service
Craig Sprinkle, Engineering-Science, Inc.
Jack L. Fiveash, Jr., Fiveash & Associates
Pete Dohms, Condor Earth Technologies, Inc.

Policy 11.B.5.8 - Not withstanding the future land use designation of the Beulah Landfill Site being Conservation, the site may not be developed for any purpose. The only improvement which will be allowed (except as otherwise necessary for remediation or closure) on the site is the construction and erection of security fencing so as to prohibit access to the site by anyone, excluding public officials in the routine conduct of their duties. Thus, the only allowed access to the site by anyone, including public officials, will be during course of investigation, remediation, closure, or monitoring the conditions of the landfill site (see Policy 7.A.4.7)

ATTACHMENT 2

CLOSURE PERMIT, BEULAH LANDFILL SITE
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

In the matter of an
Application for Permit
By:

DEP File No. 253440
Escambia County

Escambia County Board of
County Commissioners
223 Palafox Place
Pensacola, Florida 32501

_____/

Enclosed is Permit Number SF17-253440 to close the Escambia County Beulah Landfill, issued pursuant to Section 403.087, Florida Statutes.

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee 32399-2400, within 14 days of receipt of this Permit. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

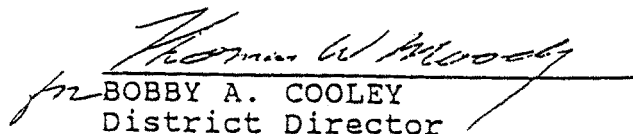
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice in the office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes, and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This permit is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Pensacola, Florida.

State of Florida Department
of Environmental Protection


for BOBBY A. COOLEY
District Director

160 Governmental Center
Pensacola, Florida 32501-5794
(904) 444-8300

File No. 253440
Escambia County
Beulah Landfill

CERTIFICATE OF SERVICE

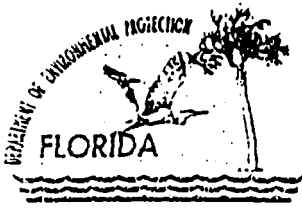
The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT ISSUANCE and all copies were mailed by certified mail before the close of business on July 8, 1994 to the listed persons.

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(9), Florida Statutes, with the designated Department clerk, receipt of which is hereby acknowledged.

A. J. Polk July 8, 1994
Clerk Date

Copies furnished to:

Escambia County Solid Waste Department
Escambia County Public Health Unit
SCS Engineers, Inc.
Solid Waste Management



Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

PERMITTEE:

Escambia County Board of
County Commissioners

I.D. Number: 1017C00001
Permit/Certification Number: SF17-253440
Date of Issue: July 8, 1994

Expiration Date: July 1, 1999
County: Escambia
Latitude/Longitude: 30°30'58"N/87°20' 42"W
Section/Township/Range: 15/01S/31W
Project: Beulah Landfill

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Rule 17-701. The above named applicant, hereinafter called permittee, is hereby authorized to perform the work or close the facility shown in the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Close a 102 acre Class I landfill located 0.8 miles north of U.S. Highway 90 on Jamesville Road in southwestern Escambia County.

Closure of the landfill shall be in accordance with the application received June 30, 1994, and the application provisions of Closure Permit SF17-151349, except as modified by the conditions of this permit.

PERMITTEE:

Escambia County Board of
County Commissioners

I.D. Number: 1017C00001

Permit/Certification Number: SF17-253440

Date of Issue: July 8, 1994

Expiration Date: July 1, 1999

County: Escambia

Latitude/Longitude: 30°30'58"N/87°20' 42"W

Section/Township/Range: 15/01S/31W

Project: Beulah Landfill

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to the authority of Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

PERMITTEE:

Escambia County Board of
County Commissioners

I.D. Number: 1017C00001

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Section/Township/Range: 15/01S/31W

Project: Beulah Landfill

GENERAL CONDITIONS:

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of this permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. A description of and cause of noncompliance; and
- b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

PERMITTEE: I.D. Number: 1017C00001
Escambia County Board of Permit/Certification Number: SF17-253440
County Commissioners Date of Issue: July 8, 1994
Expiration Date: July 1, 1999
County: Escambia
Latitude/Longitude: 30°30'58"N/87°20' 42"W
Section/Township/Range: 15/01S/31W
Project: Beulah Landfill

GENERAL CONDITIONS:

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by this permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurement;
 - the person responsible for performing the sampling or measurement;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

PERMITTEE:

Escambia County Board of
County Commissioners

I.D. Number: 1017C00001

Permit/Certification Number: SF17-253440

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County: Escambia

Latitude/Longitude: 30°30'58"N/87°20' 42"W

Section/Township/Range: 15/01S/31W

Project: Beulah Landfill

GENERAL CONDITIONS:

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

15. The Department may modify these conditions or impose new conditions as it deems necessary to assure compliance with the provisions of Chapter 403, Florida Statutes, and other applicable regulations.

16. The Department shall be notified and prior approval shall be obtained of any changes or revisions proposed during closure activities or during the long term care period.

17. A copy of the Department approved engineering drawings, plans, reports, closure plan, and supporting information shall be kept at this landfill any time that closure activities are being performed until the official date of closing has been established by the Department.

18. Surface water runoff and/or diversion controls included in the plans and/or this permit shall be installed and operational prior to completion of the closure activities. Surface water runoff shall be controlled during closure activities and shall comply with F.A.C. Chapter 17-3 at the site boundary.

19. The allowable zone of discharge (ZOD) for this permit shall be as follows:

The horizontal ZOD shall extend to the existing property line indicated on Attachment 1.

The vertical ZOD shall extend from land surface to minus 1/8 feet NGVD.

Compliance with water quality standards of Rule 17-520.420, F.A.C., and as contained in Rule 17-550.310 and 17-550.320, F.A.C., shall be met at and beyond the edges of the ZOD. Exemption from secondary drinking water standards outside a zone of discharge in class G-II ground water, as contained in Rule 17-520.520, F.A.C., is hereby revoked. Within and beyond the edge of the ZOD, compliance with minimum ground water criteria of Rule 17-520.400, F.A.C., shall be met. Surface water criteria in accordance with Rules 17-302.500, 17-302.510 and 17-302.560, F.A.C., shall be met beyond the ZOD.

PERMITTEE:

Escambia County Board of
County Commissioners

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Section/Township/Range: 15/01S/31W

Project: Beulah Landfill

SPECIFIC CONDITIONS:

20. The monitoring network shall include six wells and four surface water sampling point. The network shall be as graphically represented an Attachment 1 and as described below.

New wells shall be 4 inch diameter with an appropriate screen length and it shall be constructed in accordance with the guidelines provided on Attachment 2. Sieve analyses shall be submitted and shall be used for proper well design. The screen shall be installed in the Surficial Aquifer not in clay horizons. The required well construction permit shall be obtained from the Northwest Florida Water Management District. Upon installation and after settling, the new wells shall be properly developed. Upon completion of construction of the new wells, the lithologic log, "as-installed" diagram and a description of well development shall be submitted to the Department.

All wells shall be located by a registered Florida land surveyor and the coordinates shall be reported in accordance with Rule 17-701.510(3)(d)1., F.A.C. All surface water sampling points shall be similarly located and coordinates reported in accordance with Rule 17-701.510(4) (c), F.A.C.

Existing wells not used in the approved monitoring network for collection of samples or water elevation data shall be properly maintained or shall be properly abandoned in accordance with Rule 17-532.500(4), F.A.C. Appropriate well abandonment permits shall be obtained from the Northwest Florida Water Management District.

The water quality monitoring network shall consist of the following:

<u>Test Site Name</u>	<u>Designation</u>	<u>Approximate Location</u>	<u>Test Site Number</u>
MW-4	Background	North of NW property corner	1017A12958
BWM-3	Detected	Center of site	1017A12959
BWM-1	Compliance	Midway along South property line	1017A12960
BWM-2	Compliance	750' N or SE property corner	1017A12961
BWM-7	Compliance	850' S of NE property corner	1017A12962

PERMITTEE:

Escambia County Board of
County Commissioners

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Section/Township/Range: 15/01S/31W

Project: Beulah Landfill

SPECIFIC CONDITIONS:

<u>Test Site Name</u>	<u>Designation</u>	<u>Approximate Location</u>	<u>Test Site Number</u>
MW-6	Compliance	SE property corner	1017A12963
SW-6	Upgradient	NE of site in 11 Mile Creek	1017A12964
SW-7	Detection	Coffee Creek	1017A12965
SW-4	Compliance	E of BWM-2 in 11 Mile Creek	1017A12966
SW-3	Compliance	S of MW-6 in 11 Mile Creek	1017A12967

21. All monitoring wells, as described in Condition 20, shall be sampled semiannually with analyses for the parameters listed in Rule 17-701.510(8)(a), F.A.C. Monitoring well water levels shall be measured on the same day and recorded prior to evacuating the wells or collecting samples. Water level, top of well casing and land surface elevations at each well site, at a precision of plus or minus 0.01 foot (NGVD), shall be reported on each analysis report. At least three well volumes shall be removed from each well and the field parameters of Rule 17-701.510(8)(a), F.A.C., shall be stabilized prior to sampling.

All surface water points shall be sampled semiannually for the parameters listed in Rule 17-701.510(8)(b), F.A.C. Rainfall at the site shall be measured on a daily basis and the results submitted with the semiannual monitoring reports.

The results of each set of semiannual ground water and surface water analyses shall be submitted no later than the end of May and November each year, commencing with the November 1994 report.

22. If at any time it is determined that any well in the routine monitoring system is not functioning properly to provide representative water quality samples, within 15 days of discovery a proposal for well remediation or replacement shall be submitted to the Department. This proposal shall be implemented within 30 days of Department approval.

PERMITTEE:

Escambia County Board of
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Project: Beulah Landfill

SPECIFIC CONDITIONS:

23. Attachment 3, Form 17-1.216(2), F.A.C., shall be reproduced by the permittee and be used for water quality data submittals. A separate report is required for each sampling point. All water quality monitoring reports required by this permit shall be submitted to the Northwest District Office, 160 Governmental Center, Pensacola, Florida 32501-5794. The Department identification number (GMS #) for this landfill 1017C00001, shall be recorded on each report. The Test Site Name and Number shall be used on each report to identify the sampling point. A master list of analyses parameter storet codes is provided by Attachment 4. The appropriate storet code shall be listed in the extreme left column of the forms for each parameter.

24. A complete sampling record shall be provided for each sampling point. This record shall include water level; total depth of the well; volume of water in the well; volume of water removed; stabilization documentation; time interval of purging; time sample is taken; and device(s) used for purging (including discharge rate) and sampling. The permittee may wish to reproduce and use Attachment 5 (Form AP1) for reporting this information.

25. In the event that water quality monitoring shows a violation of the applicable water quality standards, the permittee shall arrange for a confirmation resampling within 15 days after the permittee's receipt of laboratory results. In the event that the permittee chooses not to conduct the reconfirmation sampling, the Department shall consider the initial analysis to be representative of the current water quality conditions at this facility. If the initial results demonstrates or the resampling confirms the ground water and/or surface water contamination, the permittee shall notify the Department in writing within 14 days of this finding. Upon notification by the Department, permittee shall initiate assessment monitoring and corrective actions in accordance with Rule 17-701.510(7), F.A.C.

26. All water quality monitoring required by this permit shall be in accordance with Rules 17-520.300 and 17-4.246, F.A.C., and shall be carried out under a Department approved Comprehensive Quality Assurance Plan in accordance with Rule 17-160, F.A.C. Requirements for these plans may be obtained from the Quality Assurance Section, (904) 488-2796. The permittee shall provide to the Northwest District Office, within 90 days after receipt of this permit, name(s) and telephone number(s) of companies used for field and laboratory services and the date of approval of the Comprehensive Quality Assurance Plan. The Department shall receive written notification of any change in field or laboratory service suppliers. This notification shall be required prior to sample collection.

PERMITTEE:

Escambia County Board of
County Commissioners

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Project: Beulah Landfill

SPECIFIC CONDITIONS:

27. Every two years of water quality data collection, a written technical report shall be prepared and submitted to the Department which summarizes and interprets the water quality data and water levels from permit issuance to present. The report shall be submitted by a qualified professional and shall contain the following items at a minimum:

- a. Tables and graphs of water quality data, including hydrographs, for all monitoring wells. Rainfall data should be included with the hydrographs.
- b. A comparison of water quality results between upgradient and downgradient wells and surface water points.
- c. Summary of all violations of applicable water standards.
- d. Ground water contour maps for each sampling event.
- e. A discussion of any data that is thought to be inconsistent or suspect.
- f. A summary of the physical condition of the monitoring system. This should be based on visual observation and sampling records.
- g. A survey map of all existing monitoring well locations.

The first technical report shall be submitted no later than the end of November 1996.

28. The permittee shall maintain compliance with Rule 17-701.630, F.A.C., by submitting all required updated supporting documentation in a timely manner as outlined in the rule. All submittals in response to this specific condition shall be submitted to: Financial Coordinator, Solid Waste Section, Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, with a copy to this District Office.

29. The permittee shall furnish the Department with a key or the combination to the lock(s) on the entrance gate(s). In the event the lock is changed, the permittee shall furnish the Department with a new key or the combination, as appropriate, within 15 days after lock replacement.

PERMITTEE:

Escambia County Board of
County Commissioners

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Project: Beulah Landfill

SPECIFIC CONDITIONS:

30. The final cover shall include establishing a grass vegetative cover over all non-vegetated areas. The planting of pine trees or other vegetative species which will penetrate the impermeable cover is not allowed.

31. Permittee shall complete closure activities by March 31, 1995.

32. Upon completion of the required closure procedures contained in Rule 17-701.600, F.A.C., permittee shall provide the Department with all the required documentation, including but not limited to, recordation, final survey, record drawings of the site, certification by the Engineer of Record, and easement and access agreements with property owner and any other items required by the permit to demonstrate compliance and shall request an official date of closing for the facility. The long term care period shall be determined by that official date.

33. The permittee shall, no less than 60 days prior to the expiration date, apply for renewal of this permit in accordance with F.A.C. Rule 17-4.090 on the appropriate form.

34. The permanent Department identification number (GMS No.) For this landfill is 1017C00001. Please cite this number on all reports and correspondence concerning this facility.

35. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 436-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 438-8360 during normal working hours.

Expiration date:

July 1, 1999

Issued this

8th

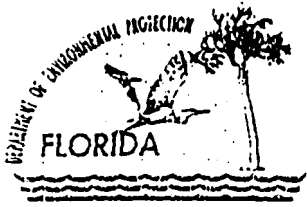
day of

July

1994.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

for Thomas W. Moody
BOBBY A. COOLEY
District Director



Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

July 10, 1995

Mr. Terry Todd
Acting Director
Department of Environmental
Resources Management
13009 Beulah Road
Cantonment, Florida 32533-0081

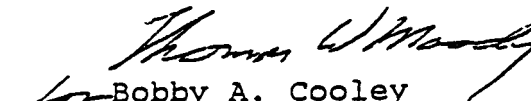
Dear Mr. Todd:

This is in response to your application to modify Beulah Landfill, permit number SF17-253440, to change (1) the water quality monitoring plan in accordance with the water quality monitoring plan report submitted November 4, 1994, (2) the stormwater management system in accordance with the engineering report submitted May 2, 1995, and (3) the final cover in accordance with the engineering reports submitted May 2, 1995 and May 26, 1995.

Your request is approved as modification No. 1 to permit SO17-253440. Specific Condition 20 and Attachments 1, 3 and 4 are canceled. Enclosed are replacement Specific Condition 20 and Attachments 1, 3 and 4. This letter and all enclosures shall be attached to and become a part of your permit. All other conditions of your permit remain in effect.

If you have any questions, please call Jack McNulty, Solid Waste Section Supervisor, at 444-8360.

Sincerely,


for Bobby A. Cooley
District Director

BAC:jml
Enclosures
cc: Robert Gardner
David Dee

PERMITTEE:

Escambia County Board of
County Commissioners

I.D. Number: 1017C00001

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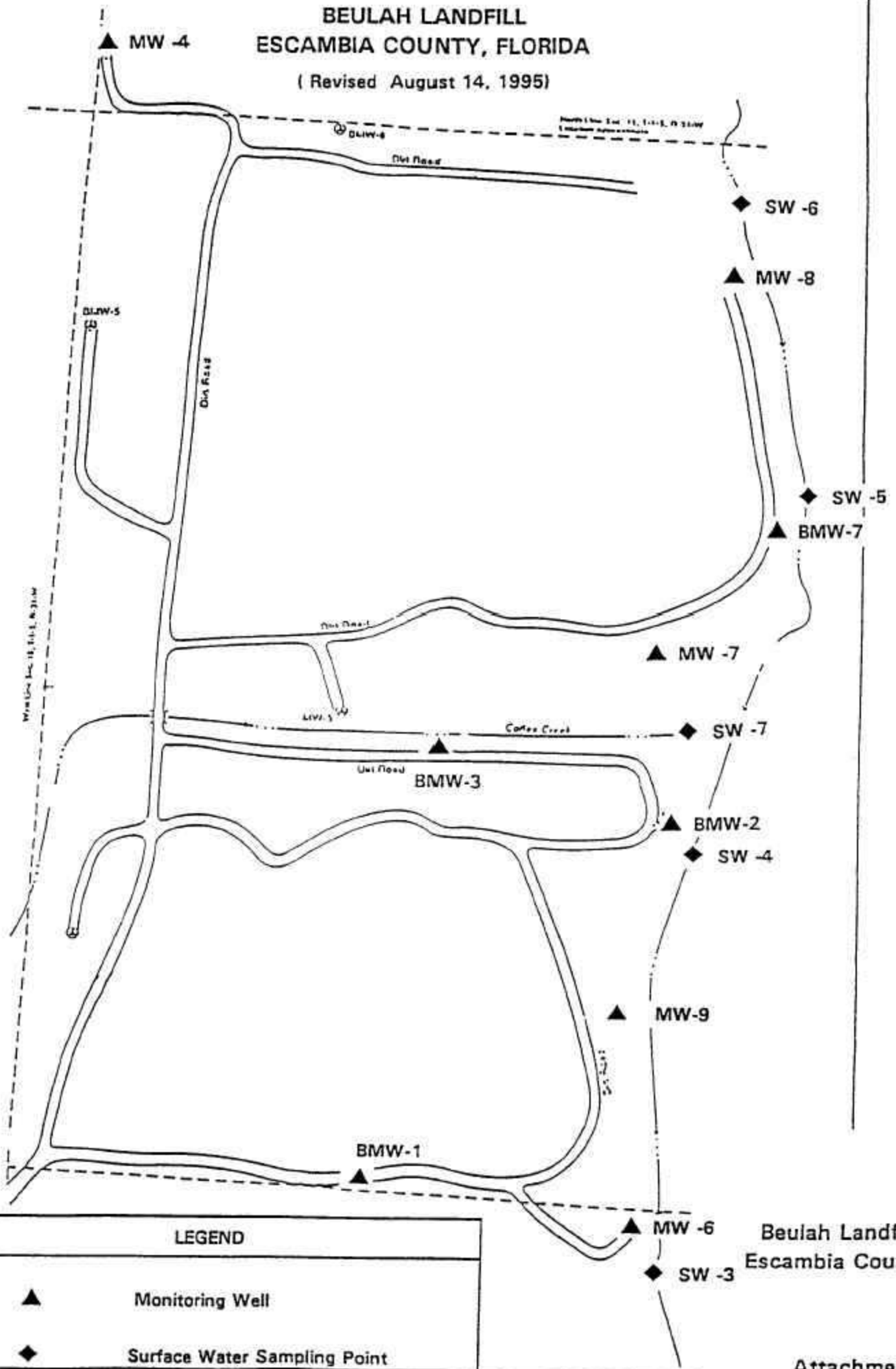
Project: Beulah Landfill

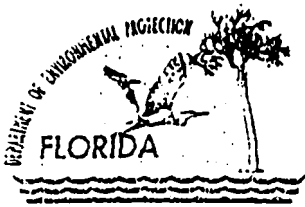
SPECIFIC CONDITIONS:

<u>Test Site Name</u>	<u>Designation</u>	<u>Approximate Location</u>	<u>Test Site Number</u>
MW-4	Background	North of NW property corner	1017A12958
BWM-3	Detection	Center of site	1017A12959
BWM-1	Compliance	Midway along south property line	1017A12960
BWM-2	Compliance	750' N of SE property corner	1017A12961
BWM-7	Compliance	850' S of NE property corner	1017A12962
MW-6	Compliance	SE property corner	1017A12963
SW-6	Upgradient	NE of site in 11 Mile Creek	1017A12964
SW-7	Detection	Coffee Creek	1017A12965
SW-4	Compliance	E of BWM-2 in 11 Mile Creek	1017A12966
SW-3	Compliance	S of MW-6 in 11 Mile Creek	1017A12967
MW-7	Detection	450' SW of BWM-7 N of Coffee Creek	
MW-8	Detection	350' S of NE Property corner	
MW-9	Detection	400' N of SE Property corner	

BEULAH LANDFILL ESCAMBIA COUNTY, FLORIDA

(Revised August 14, 1995)





Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

August 14, 1995

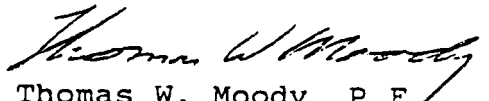
Mr. Terry Todd Acting Director
Department of Environmental
Resources Management
13009 Beulah Road
Cantonment, Florida 32533-0081

Dear Mr. Todd:

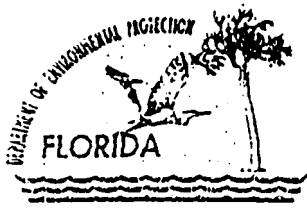
Attachment 1 to the July 10 modification to Escambia County Beulah Landfill, permit No. SF17-253440, reflected an inappropriate location for monitoring well MW-9. Enclosed is a revised Attachment 1 for inclusion the Beulah Landfill permit.

If you have any questions, please call Jack McNulty, Solid Waste Section Supervisor, at 444-8360.

Sincerely,


Thomas W. Moody, P.E.
Waste Management Program
Administrator

TWM:jml
Enclosure
cc: Robert Gardner
Waste Management Section



Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

May 30, 1997

Mr. David Gregory, Chief
Solid Waste Management Division
13009 Beulah Road
Cantonment, Florida 32533

Dear Mr. Gregory:

The department has completed its review of the Beulah Landfill two year technical report submitted December 31, 1996. Enclosed is a copy of Mr. Hartshorn's evaluation of the report for your information. As noted in this evaluation, we request that pentachlorophenol, naphthalene and other semi-volatiles be included in the routine sampling of all permitted wells and surface water sampling points.

If you have questions, please call Jack McNulty, Solid Waste Section Supervisor, at (904) 444-8360.

Sincerely,

Thomas W. Moody, P.E.
Program Administrator
Waste Management

TWM: jml
Enclosure

ATTACHMENT 3

INTERVIEW QUESTIONNAIRES
BEULAH LANDFILL SITE FIVE-YEAR REPORT

INTERVIEW FORM

BEULAH LANDFILL SITE
FIVE-YEAR REPORT

NAME: Cindy Anderson, P.E.

AFFILIATION: County Engineer, Escambia County, Florida

RELATION TO SITE: Previous PRP Staff (Oversight during R.I.)

HISTORY OF INVOLVEMENT WITH SITE: Was lead on-site PRP representative
during the Remedial Investigation.

DATE OF INTERVIEW: September 1, 1998

INTERVIEW BY: () - In Person (XX) - Phone () - Written
() - Other (Describe: _____)

INTERVIEW COMPLETED BY: Peter H. Dohms, P.G.

SIGNATURE: _____



INTERVIEWER AFFILIATION: Condor Earth Technologies, Inc.

INTERVIEW FORM
(Previous Staff/Management)
BEULAH LANDFILL SITE
FIVE-YEAR REPORT

NAME: Cindy Anderson, P.E.

Briefly describe your involvement with the site prior to the ROD:

County (Lead PRP) representative on site full time during R.I. field activities. Participated in all PRP Meetings, reviewed all analytical data, and reviewed all reports prepared on behalf of PRPs.

Briefly describe your involvement with the site since the ROD:

None since September 20, 1993.

Are you familiar with the remedy stated in the ROD? (X) Yes () No

If yes, do you believe the remedy is protective of human health and the environment? (XX) Yes () No

On what do you base that answer: Experience at the site, education and knowledge of basic site remediation.

Do you believe the County is effectively pursuing the remedy, as defined in the ROD? (XX) Yes () No () Don't Know

On what do you base that answer: Approval by all governmental entities; contracts in place and closure fully underway.

Do you have any other comments regarding the Site: If site closure had been completed in accordance with State requirements, as was specified 10 years ago by FDEP, the County would not still be working to complete closure today.

Signature:
(optional)



Date: September 1, 1998

INTERVIEW FORM

BEULAH LANDFILL SITE
FIVE-YEAR REPORT

NAME: Gary C. James

AFFILIATION: nearby resident

RELATION TO SITE: "nearest neighbor"

HISTORY OF INVOLVEMENT WITH SITE: Has lived adjacent to the site for
his entire adult life.

DATE OF INTERVIEW: September 9, 1998

INTERVIEW BY: () - In Person (XX) - Phone () - Written
() - Other (Describe: _____)

INTERVIEW COMPLETED BY: John C. Kusnerek

SIGNATURE: 

INTERVIEWER AFFILIATION: Escambia Co. Dept. of Public Works

INTERVIEW FORM
(Neighbor of Site)
BEULAH LANDFILL SITE
FIVE-YEAR REPORT

NAME: Gary C. James; 7526 Jamesville Road, Pensacola, Florida

Briefly describe your knowledge of the site prior to the ROD:

Worked as night watchman at Beulah Landfill (1993); not much dirt
over waste then. Saw drums of nylon waste and rolls of nylon waste
at site. Saw drums of liquid waste during active life of landfill.

Briefly describe your knowledge of the site since the ROD:

No specific knowledge.

Are you familiar with the remedy stated in the ROD? () Yes (X) No

If yes, do you believe the remedy is protective of human health and
the environment? (X) Yes () No (X) Don't Know

On what do you base that answer: Don't have enough information
regarding the site.

Do you believe the County is effectively pursuing the remedy, as
defined in the ROD? () Yes () No (X) Don't Know

On what do you base that answer: Hope it does; I don't have enough
knowledge to base an opinion.

Do you have any other comments regarding the Site: Have the drivers
hauling dirt to the site slow down; some are speeding.

Signature: _____
(optional)

Date: September 9, 1998

INTERVIEW FORM

BEULAH LANDFILL SITE
FIVE-YEAR REPORT

NAME: Bradley T. Hartshorn, Environmental Specialist II

AFFILIATION: Florida Department of Environmental Protection

RELATION TO SITE: Technical Reviews of Compliance Submittals

HISTORY OF INVOLVEMENT WITH SITE: Four years of completing the
technical reviews of compliance submittals.

DATE OF INTERVIEW: August 26, 1998

INTERVIEW BY: () - In Person (XX) - Phone () - Written
() - Other (Describe: _____)

INTERVIEW COMPLETED BY: Peter H. Dohms, P.G.

SIGNATURE: 

INTERVIEWER AFFILIATION: Condor Earth Technologies, Inc.

INTERVIEW FORM
(State Contract)
BEULAH LANDFILL SITE
FIVE-YEAR REPORT

NAME: Bradley T. Hartshorn, Environmental Specialist II

Briefly describe your involvement with the site prior to the ROD:

No involvement prior to ROD signature (September 1993).

Briefly describe your involvement with the site since the ROD:

Since 1994, responsible for reviews of semi-annual water quality
monitoring reports, periodic assessment reports, and Closure Permit
renewal.

Are you familiar with the remedy stated in the ROD? () Yes (X) No

If yes, do you believe the remedy is protective of human health and
the environment? () Yes () No

On what do you base that answer: _____

Do you believe the County is effectively pursuing the remedy, as
defined in the ROD? (X) Yes () No () Don't Know

On what do you base that answer: Reports that are submitted on

time demonstrating satisfactory progress in closing, securing, and
monitoring water quality at the Site.

Do you have any other comments regarding the Site: Yes, the County
has demonstrated full cooperation with this Agency.

Signature: _____
(optional)

Date: August 26, 1998

INTERVIEW FORM
(State Contract)
BEULAH LANDFILL SITE
FIVE-YEAR REPORT

NAME: Bradley T. Hartshorn, Environmental Specialist II

Briefly describe your involvement with the site prior to the ROD:

No involvement prior to ROD signature (September 1993).

Briefly describe your involvement with the site since the ROD:

Since 1994, responsible for reviews of semi-annual water quality
monitoring reports, periodic assessment reports, and Closure Permit
renewal.

Are you familiar with the remedy stated in the ROD? () Yes (X) No

If yes, do you believe the remedy is protective of human health and
the environment? () Yes () No

On what do you base that answer: _____

Do you believe the County is effectively pursuing the remedy, as
defined in the ROD? (X) Yes () No () Don't Know

On what do you base that answer: Reports that are submitted on

time demonstrating satisfactory progress in closing, securing, and
monitoring water quality at the Site.

Do you have any other comments regarding the Site: Yes, the County
has demonstrated full cooperation with this Agency.

Signature:
(optional)

Bradley T. Hartshorn

Date: August 26, 1998

INTERVIEW FORM

BEULAH LANDFILL SITE
FIVE-YEAR REPORT

NAME: John Kusnerek

AFFILIATION: Compliance Manager, Solid Waste Division, Escambia
County Public Works Department, 13009 Beulah Rd., Cantonment, FL

RELATION TO SITE: Responsible for compliance activities.

HISTORY OF INVOLVEMENT WITH SITE: Compliance oversight since 1995;
management of compliance since 1997.

DATE OF INTERVIEW: September 1, 1998

INTERVIEW BY: () - In Person (XX) - Phone () - Written
() - Other (Describe: _____)

INTERVIEW COMPLETED BY: Peter H. Dohms, P.G.

SIGNATURE: _____

INTERVIEWER AFFILIATION: Condor Earth Technologies, Inc.

INTERVIEW FORM
(Local Government Contact)
BEULAH LANDFILL SITE
FIVE-YEAR REPORT

NAME: John Kusnerek, compliance Mgr., county Public Works Dept.

Briefly describe your involvement with the site prior to the ROD:

None

Briefly describe your involvement with the site since the ROD:

Compliance management; responsible for ensuring that the site
is in compliance with Federal, State and local laws and
regulations.

Are you familiar with the remedy stated in the ROD? (X) Yes () No

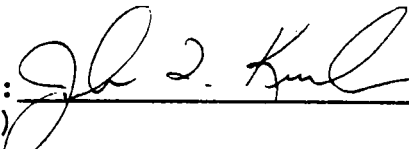
If yes, do you believe the remedy is protective of human health and the environment? (XX) Yes () No

On what do you base that answer: The site is remote; the area in
sparsely populated; closure is being done in accord with FDEP
standards.

Do you believe the County is effectively pursuing the remedy, as defined in the ROD? (XX) Yes () No () Don't Know

On what do you base that answer: Contractor is at work to complete
the closure in accordance with FDEP requirements.

Do you have any other comments regarding the Site: The site will
undergo monitoring and post-closure care for the next 30 years;
this will ensure the remedy will remain protective.

Signature: 
(optional)

Date: September 1, 1998

INTERVIEW FORM

BEULAH LANDFILL SITE
FIVE-YEAR REPORT

NAME: Peter H. Dohms, P.G.

AFFILIATION: Condor Earth Technologies, Inc., Pensacola, FL

RELATION TO SITE: Consultant to County on site since 1991.

HISTORY OF INVOLVEMENT WITH SITE: Advised County through PRP

search, development of RI work scope, and completion of RI.

Prepared current water quality monitoring plan for FDEP review

and approval, reviewed all water quality monitoring analytical

data from 1994 through current.

DATE OF INTERVIEW: August 12, 1998

INTERVIEW BY: () - In Person () - Phone (X) - Written
() - Other (Describe: _____)

INTERVIEW COMPLETED BY: John Kusnerek, Escambia Co. Public Works

SIGNATURE: 

INTERVIEWER AFFILIATION: Escambia County Public Works Department

INTERVIEW FORM
(O & M Contractor)
BEULAH LANDFILL SITE
FIVE-YEAR REPORT

NAME: Peter H. Dohms, P.G.; Condor Earth Technologies, Inc.

Briefly describe your involvement with the site prior to the ROD:

I consulted to Escambia County during the PRP negotiations,
assisted with field work during the R.I., supplied language for
use by the PRP's lead consultant, and reviewed EPA documents.

Briefly describe your involvement with the site since the ROD:

I have consulted to Escambia County during their negotiations
with FDEP on site closure and water quality monitoring, I wrote
the water quality monitoring plan for FDEP's approval, and I
have reviewed and summarized all water quality monitoring data.

Are you familiar with the remedy stated in the ROD? (X) Yes () No

If yes, do you believe the remedy is protective of human health and the environment? (X) Yes () No

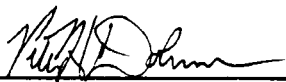
On what do you base that answer: My knowledge of the site geology
and ground water flow, and my knowledge of monitoring results.

Do you believe the County is effectively pursuing the remedy, as defined in the ROD? (X) Yes () No () Don't Know

On what do you base that answer: I have worked closely with the
County staff during their pursuit of the remedy.

Do you have any other comments regarding the Site: The County
should be allowed to complete its landfill closure project and
continue the post-closure long term care at the Site.

Signature: _____
(optional)



Date: August 12, 1998

ATTACHMENT 4

INSPECTION REPORT, BEULAH LANDFILL SITE
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION,
NORTHWEST DISTRICT



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION SOLID WASTE MANAGEMENT FACILITY INSPECTION CHECKLIST

GMS I.D. No. _____ Inspection Date: 6-11-98
 Facility Name: Bentley Landfill Permit No. SE17-25340 Expiration Date: 7-1-99
 Address (location by section, township and range): Jamestown Road
 City: Pensacola State: _____ Zip: _____
 Permittee or Operating Authority: Escambia Co. Dept. of Public Works (ECPW)
 Telephone Number (Permittee or Operating Authority): 908-6628

Inspection Participants - Include ALL Landfill and Department Employees Specifying Titles (Indicate Principal Inspectors):

J. McNulty, Michael W. Stephens (ECPW), Dave Grayson, John Kessel (ECPW)

TYPE OF FACILITY:

Landfill

☒ Class I

☐ Class II

☐ Class III

Other

☐ Composting

☐ Shredder

☐ Incinerator/Trench Burner

☐ Resource Recovery

☐ Energy ☐ Materials

☐ C&D Facility

☐ Transfer Station

☐ Unauthorized Disposal

TYPE OF INSPECTION:

☐ Construction Completion (☐ phase)

☐ Operation

☒ Closure

☐ Post-Closure

☐ Reinspection

☐ Compliance Response

☐ Facility File Review

☐ Other

REQUIREMENTS

THE REQUIREMENTS LISTED ON THIS INSPECTION REPORT ARE BASED UPON RULES OF THE FLORIDA ADMINISTRATIVE CODE. A "NO" RESPONSE TO A REQUIREMENT (UNLESS OTHERWISE NOTED) REFLECTS A DEFICIENCY OR POSSIBLE VIOLATION OF THE CORRESPONDING DEPARTMENT RULES. EACH DEFICIENCY OR POSSIBLE VIOLATION IS DISCUSSED IN THE NARRATIVE SECTION OF THIS REPORT.

I. CONSTRUCTION VERIFICATION		YES	NO	DATE	REMARKS
1.	Subgrade or foundation prepared according to approved plan? 62-701.400(3)(a)(2)				
2.	Under construction/installation according to approved plan? 62-701.400(3)				
3.	Leachate control system installation according to approved plan? 62-701.400(4)				
4.	Disposal units constructed at planned intervals? 62-701.400(2)				
5.	Gas control system installation according to approved plan? 62-701.400(10)(a)				
6.	Surface water management system constructed according to approved plan? 62-701.400(9)				
7.	Ground water monitoring system constructed according to approved plan? 62-701.510(2)				
8.	Leachate storage constructed according to approved plan? 62-701.400(8)				
9.	Linear quality assurance plan followed? 62-701.400(7)				
II. OPERATIONS					
10.	Trained operator on site at Class I and II during operation? 62-701.500(11)				
11.	Approved operating plan, complete operating records and all permit report documents available? 62-701.500(2)(a)(2)(b)(4)(b)(13)				
12.	Gas monitoring according to permit? 62-701.400(10)(a) and 62-701.500(8)				
13.	Gas controlled to minimize off site odors? 62-701.400(10)(a)				
14.	At least one spooter at each working face during operation at Class I and II? 62-701.500(11)				
15.	Load checking program implemented? 62-701.500(8)				
16.	Waste compaction as required? 62-701.500(7)(a)				
17.	In compliance with all permit specific conditions? 62-701.320(11)				
18.	Working face/height above ground no greater than 3 to 1 (dip) 62-701.500(7)(c)				
19.	Narrow working face practices? 62-701.500(7)(d)				
20.	Only permitted waste types disposed of? 62-701.340(3) and 62-701.500(2)(c)(b)(1)(a)				
21.	In compliance with prohibition on unauthorized coverings? 62-701.500(7)(h)				
22.	Required signs for operations (directions and public information)? 62-701.500(11)(a)				
23.	Weighting or measuring of incoming waste? 62-701.500(4)(a)(b)(2)(d)				
24.	Method and sequence of filling waste according to approved plan? 62-701.500(2)(h)				
25.	Sufficient spare parts equipment? 62-701.500(11)(a)				
26.	Sufficient reserve operating equipment for other breakdowns? 62-701.500(11)(b)				
27.	Adequate communication facilities? 62-701.500(11)(c)				
28.	Solid waste being burned in accordance with Department rules? 62-701.300(3)				
29.	Proper control or disposal of asbestos and other special wastes? 62-701.520(4)				

				YES	NO	NA	NA
III OPERATIONS (Continued)							
30.	In compliance with prohibition on lead acid battery disposal?	62-701.300(8)(b)					✓
31.	In compliance with prohibition on used oil disposal?	62-701.300(8)(b)					✓
32.	In compliance with prohibition on yard trash disposal in lined landfills?	62-701.300(8)(c)					✓
33.	In compliance with prohibition on white goods disposal?	62-701.300(8)(d)					✓
34.	In compliance with prohibition on whole tire disposal?	62-701.300(8)(e)					✓
IV MAINTENANCE							
35.	Effective barrier to prevent unauthorized entry and dumping?	62-701.500(5)					✓
36.	Adequate vector control using approved methods?	62-701.500(7)(a)					✓
37.	Coupsal area easily accessible?	62-701.500(12)					✓
38.	Retention and/or detention ponds, ditches, culverts and berms maintained?	62-701.500(10)					✓
39.	Adequate dust control using approved methods?	62-701.500(11)(a)					✓
40.	Litter control maintained?	62-701.500(14) & (13)(a)					✓
41.	Fire protection and fire fighting facilities adequate and operational?	62-701.500(13)(b)					✓
42.	Ground water well intact and functioning properly?	62-701.610(2)(b) and 62-701.630(7)					✓
43.	Gas vents intact and functioning properly?	62-701.500(9)					✓
44.	Leachate control, collection and treatment as required?	62-701.500(8)					✓
IV WATER MANAGEMENT AND MONITORING							
45.	Water quality sampling and testing according to standard procedures and at required frequency?	62-701.610(3)					✓
46.	Mixing of leachate and storm water prevented?	62-701.400(9)(d)					✓
47.	Storm water runoff/runoff controlled, collected and treated as required?	62-701.400(8) and 62-701.600(10)					✓
48.	Leachate sampling and testing as required?	62-701.600(8)					✓
V COVER							
49.	Adequate quantity of acceptable cover material available as stated in permit application?	62-701.330(4)(a)&(b)					✓
50.	Frequency, amount and quality of initial cover as required?	62-701.500(7)(a)					✓
51.	Frequency, amount and quality of intermediate cover as required?	62-701.500(7)(b)					✓
52.	Adequate erosion control?	62-701.500(7)(c)					✓
VI CLOSURE							
53.	Final cover installation according to approved closure design plan?	62-701.600(5)(1)(2)					✓
54.	Facility meets closure requirements prohibiting unauthorized dumping?	62-701.600(5)(3)					✓
55.	All actions for closure completed according to approved closure operation plan?	62-701.600(6)					✓
56.	Final survey, site plan and "Declaration to the Public" filed at county clerk's office and certified copy filed with the Department?	62-701.610(2)					✓
57.	In compliance with approved use of closed landfill and integrity of environmental protection is maintained?	62-701.610(7)					✓
58.	Long term care performed according to approved closure plan?	62-701.620					✓
59.	In compliance with all financial assurance requirements?	62-701.630					✓
VII NON-LANDFILL SITES							
60.	Materials recovery facility operation in compliance with all permit conditions and other applicable requirements?	62-701.700					✓
61.	Transfer station operation in compliance with all general permit conditions and other applicable requirements?	62-701.801					✓
62.	Resource recovery facility in compliance with all permit conditions and other applicable requirements?	62-701.320(1)					✓
63.	Willing facility in compliance with all permit conditions and other applicable requirements?	62-701.320(1)					✓
64.	Only authorized wastes shipped to or at C&D facility?	62-701.730(8)					✓
65.	C&D facility in compliance with all permit conditions and other applicable requirements?	62-701.730 and 62-701.803					✓

VII NARRATIVE

Explanation for all "no" responses and other comments (continue on separate sheet if necessary)

II Closing:

Changes have been made to the grading plan concerning stormwater retention and other areas. Dave Ferguson will send the Dept. a copy of the changes in the immediate future.

Signed: John W. Dept. 8/1/88 Received:

REP Representative

Date

Site Representative

Date